

MAR 07 2017

Mr. Dennis W. McKinney
Corporate Director Environmental, Health and Safety
Fortune Brands Home and Security
25300 Al Moen Drive
North Olmstead, Ohio 44070

RE: Revised Remedy Implementation Plan for the Former Waterloo Industries Facility,
300 Ansborough Avenue, Waterloo, Iowa, February 8, 2017
EPA ID # IAD005277959

Dear Mr. McKinney:

The U.S. Environmental Protection Agency has reviewed the subject document, received February 9, 2017. Because of the complexity of the approval process for this document, and a desire to support Fortune Brands beginning the fieldwork to implement this remedy as soon as possible, the EPA will approve the document in stages as the reviews of separate sections are complete.

The EPA hereby approves the main text of the RIP as well as Appendices C and D, subject to resolution of the following comments:

1. Section 8.1.2 of the main text still references an "AS/SVE" system which is inconsistent with the selected remedy. This reference must be removed.
2. The response to EPA's comment 17 concerning the maintenance of the building slab as an engineered cap in Section 10.0 of the main text does not include a plan for ongoing maintenance and inspection of the slab after remedy construction. Annual inspections and maintenance as needed (such as crack sealing) during the operations and maintenance phase of the remedy must be included.
3. Section 3.4 of the Materials Management Plan in Appendix C still discusses "treatment" of impacted groundwater on-site. In response to EPA's comment 12 on Section 8.0 of the main text, the discussion of treatment was removed from that section; it must also be removed here.

The EPA has no further comments on the Health and Safety Plan in Appendix B of the RIP. Reviews of the QAPP, environmental covenant, and financial cost estimate in Appendices A, E, and F of the RIP, respectively, are underway and the EPA will provide approvals of these appendices with any necessary additional comments in the near future. Any comments provided on Appendices A, E and F in the future will not affect the approvals granted by this letter.

Please provide a revised electronic copy of the document addressing the comments above within 30 days of your receipt of this letter. If you have any questions, please call me at (913) 551-7324.

Sincerely,

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CONCURRENCES		
SYMBOL	WRAP	WRAP
NAME	Gravatt	Johnson
INITIALS/DATE	<i>GR</i> 03/03/17	<i>JO</i> 3/6/17

RCRA 03/07/2017



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Daniel Gravatt, P.G.

Project Manager

RCRA Corrective Action and Permits Section

Waste Remediation and Permitting Branch

Air and Waste Management Division

cc: Mark Seaman, ERM

Amie Davidson, IDNR